

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
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Received
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NRA

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August 26, 2005

Upper Mississippi River NW&FR
CCP Comment
Room 101
51 East Fourth Street
Winona, MN 55987

Dear Sir,

On behalf of our 4 million members, including tens of thousands in the immediate area of the Upper Mississippi River National Wildlife and Fish Refuge, the National Rifle Association would appreciate having this letter made part of the public comment record on the Draft Comprehensive Conservation Plan for the Refuge.

Our focus for comment is on the Preferred Alternative. We note that the changes being proposed which would close some waterfowl hunting areas, eliminate permanent blinds, establish party spacing, eliminate some managed hunts, and require the use of electric motors in certain areas are designed to strike a better balance between the Refuge's responsibility to manage wildlife and its responsibility to provide quality wildlife-dependent recreational opportunities. The Draft Plan gives clear and concise reasons for the changes being proposed.

While we are generally opposed to anything that significantly hinders hunter access or eliminates hunting opportunities, the NRA will defer to the comments submitted by those who hunt on the Refuge for they will have a more informed view on the ground of how those changes affect their access to the Refuge and their hunting experience. We respectfully urge that you pay particular attention to the comments of those who actually hunt the Refuge, as they are the ones who will be directly impacted by any closures or changes in access rules.

What the NRA would like to address is the proposal to restrict a hunter to no more than 25 shotshells during the waterfowl season. The objective of the restriction is to reduce the practice of "skybusting" which the plan reports results in the loss of birds due to crippling by over 50% in some areas. We are sympathetic to the Refuge's concern over the waste and wanton loss of its waterfowl resources. Not only does the loss due to crippling put hunting in an unfavorable light, but it also robs conscientious hunters of the opportunity to utilize the resource and disrupts those who hunt over decoys. We agree with the Refuge that the problem of skybusting has to be addressed, but the NRA strongly opposes the proposed "solution."

NRA has a long-standing position that controls should be placed upon those whose conduct is illegal or unethical, and not upon an entire class of citizenry. The proposed ammunition restriction affects all waterfowl hunters, not just the skybusters. It is extremely unlikely that an ammunition restriction is going to change the behavior pattern of unethical hunters or teach them to shoot more accurately. We highly recommend that the Refuge consult with hunter education instructors on the best methods of reaching all hunters visiting the Refuge about the problem of skybusting and identifying ways to reduce the practice short of an ammunition restriction. We feel it is particularly important to note that state wildlife agencies have used hunter education programs to reduce practices like skybusting rather than putting unnecessary limitations on hunters.

We strongly recommend that wildlife law enforcement officers direct their attention to those engaged in skybusting. The Draft Plan notes that officers have observed hunting parties skybusting so it does not appear to be a practice that goes unnoticed by law enforcement officials. It would seem that law enforcement's time and budget would be better spent in enforcing current laws against wanton waste, rather than checking daily each and every hunter to ensure that they are keeping within the ammunition limitation.

We appreciate the opportunity to comment on the Draft Plan.

Sincerely,



Susan Recce

Director

Conservation, Wildlife and Natural Resources